

March 13, 2023

RE: Case 22-10584-CTG

FILED
2023 MAR 14 AM 10:24
CLERK
U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

To whom it may concern:

I'm writing my RESPONSE to the letter received / filed on 2/28/23. The letter stated my claim #12 in the amount of \$5,759.32 was Satisfied. However, this claim has not been satisfied. I have never received any monies cover the claim. Below are the details of how the claim amount came about.

This claim was for unpaid commissions/income from June 2022. There was an email we received on July 13, 2022 which I've attached that stated FGMC would ONLY pay a CAP of \$15,150. Below are the loans, client's names and amount plus my commissions structure to prove they owe me more money. I was paid \$15,118.22 on July 15, 2022. My total commissions owed totaled \$20,877.54 which is where we arrive at balance owed of \$5,759.32.

My commission structure was 1.45% of gross loan amount/amounts. Here are the loans, loan numbers, client names and loan amounts to verify my information above.

600722001965 McCormick	\$300,000
600722000548 Thuve	\$536,000
600722001600 Price	\$108,000
600722000220 Hensley	\$171,830
600722000836 Martin	\$324,000
TOTAL	\$1,439,830.00

\$1,439,830.00 times my commission rate of 1.45% = \$20,877.54 in income

\$15,118.22 was paid as a CAP on July 15, 2022.

\$20,877.54 minus the \$15,118.22 (paid on July 15, 2022) leaving the balance owed to me if \$5,759.32.

Please feel free to contact me with any questions or information needed. My cell phone is (828) 781-1503. My personal email address is rollinsinc7@gmail.com

I hope to have this resolved as soon as possible.

Thank you,

Jeffrey S. Rollins

Jeffrey S. Rollins
3-10-23

Creditor Identity: 3828

Closed loans for June 2022

Loan #	Client Last Name	Loan Amount
600722001965	McCormick	\$300,000
600722000548	Thuve	\$536,000
600722001600	Price	\$108,000
600722000220	Hensley	\$171,830
600722000836	Martin	\$342,000

John Scott Watkins

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

FIRST GUARANTY MORTGAGE
CORPORATION, *et al.*,¹

Liquidating Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

Response Deadline: March 14, 2023 at 4:00 p.m.

LIQUIDATING TRUSTEE'S NOTICE OF SATISFACTION OF CLAIMS

PARTIES RECEIVING THIS NOTICE SHOULD LOCATE THEIR NAMES AND FULLY SATISFIED CLAIMS IDENTIFIED ON EXHIBIT A ATTACHED HERETO

Tanya Meerovich, solely in her capacity as liquidating trustee (the "Liquidating Trustee") of the liquidating trust (the "Liquidating Trust"), created pursuant to the *Amended, Modified And Restated Combined Disclosure Statement And Chapter 11 Plan Of First Guaranty Mortgage Corporation And Debtor Affiliate* (the "Plan") [Docket No. 671-1] and that certain trust agreement dated as of November 4, 2022 (the "Trust Agreement"), and the post-effective date debtors (the "Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases"), by and through undersigned counsel, hereby file this notice (the "Notice") identifying certain administrative and priority claims filed against the Debtors' estates that have been fully satisfied during these Chapter 11 Cases (the "Fully Satisfied Claims"). A list of the Fully Satisfied Claims is attached as **Exhibit A**.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number, were: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.



BACKGROUND

1. On June 30, 2022 (the “Petition Date”), the Debtors commenced voluntary cases under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. On August 29, 2022, the Debtors filed their schedules of assets and liabilities (the “Schedules”) and statements of financial affairs (“Statements,” and together with the Schedules, the “Schedules and Statements”) [Docket Nos. 365–368].

3. On August 31, 2022, the Court entered the *Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Setting Bar Date for the Filing of Proofs of Claim by Governmental Units, (III) Setting a Bar Date for the Filing of Requests for Allowance of Administrative Expense Claims, (IV) Establishing Amended Schedules Bar Date and Rejection Bar Date, (V) Approving the Form of and Manner for Filing Proofs of Claim, (VI) Approving Notice of Bar Dates, and (VII) Granting Related Relief* [Docket No. 382] (the “Bar Date Order”). The Bar Date Order set October 14, 2022 as the general claims bar date for the filing of proofs of claim; December 27, 2022 as the claims bar date for governmental units; and October 14, 2022 as the bar date for administrative claims arising on or prior to September 30, 2022. *Id.*

4. On November 2, 2022, the Court entered the *Findings of Fact, Conclusions of Law, and Order (I) Approving Disclosures on a Final Basis and (II) Confirming the Amended Combined Disclosure Statement and Chapter 11 Plan of First Guaranty Mortgage Corporation and Debtor Affiliate* [Docket No. 671], which among other things, confirmed the Plan.

5. Pursuant to the Plan, the Liquidating Trustee was granted the authority to object to and settle disputes regarding claims not later than the Claims Objection Deadline. *See* Plan at Section 12.2.

FULLY SATISFIED CLAIMS

6. The Liquidating Trustee, with the assistance of counsel, has determined that the Fully Satisfied Claims have been fully satisfied by the Debtors, and that no further distributions from the estates will be required on account of amounts asserted in the Fully Satisfied Claims.

RESPONSES TO THIS NOTICE

7. Any party disputing the Liquidating Trustee's position that a particular Fully Satisfied Claim has been satisfied as provided for herein and on **Exhibit A** attached hereto must file and serve a written response (a "Response"), so that it is received no later than **March 14, 2023 at 4:00 p.m. (ET)** (the "Response Deadline"). Every Response must be filed with the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801, and served upon the following parties, so that the Response is received no later than the Response Deadline, at the following addresses: (a) counsel to the Liquidating Trustee, Dentons US LLP, 601 S. Figueroa Street #2500, Los Angeles, CA 90017, Attn: Samuel R. Maizel, Esq. (samuel.maizel@dentons.com) and Tania M. Moyron, Esq. (tania.moyron@dentons.com); (b) co-counsel to the Liquidating Trustee, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, DE 19899-8705, Attn: Laura Davis Jones, Esq. (ljones@pszjlaw.com); and (c) the Office of the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Benjamin A. Hackman, Esq. (benjamin.a.hackman@usdoj.gov).

8. In the event that any Response is timely filed and served, the Liquidating Trustee will make a reasonable effort to review the Fully Satisfied Claim with the claimant to determine whether any asserted amounts were not satisfied as indicated. In the event that the parties are unable to reach a resolution, the Liquidating Trustee anticipates that a hearing will be

held on the matter at a date and time to be determined by the Liquidating Trustee, in her discretion, subject to the Court's availability.

NOTICE

9. The Liquidating Trustee intends to designate on the Debtors' claims register that the Fully Satisfied Claims have been satisfied as indicated on the attached **Exhibit A**. Out of an abundance of caution, however, the Liquidating Trustee is serving this Notice on all parties holding Fully Satisfied Claims and providing such parties with an opportunity to respond to the Liquidating Trustee's position that such claims have been satisfied.

RESERVATION OF RIGHTS

10. The Liquidating Trustee reserves any and all rights to amend, supplement, or otherwise modify this Notice and to file additional notices of this nature with respect to any and all claims filed in these Chapter 11 Cases, including, without limitation, any and all of the Fully Satisfied Claims and amounts scheduled against the Debtors' estates in the Debtors' schedules of assets and liabilities. The Liquidating Trustee also reserves any and all rights, claims, and defenses with respect to any and all of the Fully Satisfied Claims, and nothing included in or omitted from this Notice shall impair, prejudice, waive, or otherwise affect any such rights, claims, and defenses.

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EXHIBIT A

Claimant	Claim No./Schedule	Claim Amount	Explanation
Day, Lynn L	16	\$15,150.00	Claim satisfied
Milos Automation Inc.	168	\$396	Claim satisfied
Ohio Department of Taxation	58	\$3,271.58	Claim satisfied
Oregon Department of Revenue 955 Center St NE Salem, OR 97301-2555	314	\$0.00	Claim satisfied as to 2021 taxes
Quinn, Yvette	45	\$6,158.04	Claim satisfied
Rollins, Jeffrey Scott	12	\$5,759.32	Claim satisfied
Selby, Patricia G	21	Blank	Claim satisfied
Tan, Kathryn A	37	\$41,580.00	Claim satisfied

Dated: February 28, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
Mary F. Caloway (DE Bar No. 3059)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899 (Courier 19801)
Tel: (302) 652-4100
Fax: (302) 652-4400
Email: ljones@pszjlaw.com
mcaloway@pszjlaw.com

-and-

Samuel R. Maizel (*Pro Hac Vice*)
Tania M. Moyron (*Pro Hac Vice*)
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David F. Cook (DE Bar No. 6352)
DENTONS US LLP
1900 K Street, NW
Washington, DC 20006
Telephone: (202) 496-7500
Email: david.f.cook@dentons.com

Counsel to the Liquidating Trustee



Jeff Rollins <rollinsinc7@gmail.com>

Important Message for Former Employees of FGMC

4 messages

Human Resources <hrbp@fgmc.com>

Wed, Jul 13, 2022 at 7:23 PM

IMPORTANT MESSAGE FOR FORMER EMPLOYEES OF FIRST GUARANTY MORTGAGE CORPORATION RELATING TO WAGE, COMMISSION, AND EXPENSE REIMBURSEMENT CLAIMS

If you incurred reimbursable expenses on behalf of First Guaranty Mortgage Corporation on or before June 24, 2022, please submit your reimbursement request through Concur as soon as possible. **FGMC strongly encourages you to submit your reimbursement request by July 20, 2022.**

Please note that FGMC is permitted to reimburse claims that adhere to FGMC's Employee Business Expense Reimbursement Policy (the "Policy") and that otherwise comply with applicable bankruptcy law. A copy of the Policy is attached to this email for your convenience. Please ensure that you submit the required documentation along with your expense reimbursement request as set forth in the Policy.

Pursuant to Bankruptcy Court order and in accordance with Bankruptcy Code § 507(a)(4), FGMC is permitted to pay up to \$15,150 (the "Priority Cap") on account of allowed and unpaid reimbursements as well as "wages, salaries or commissions, including vacations, severance and sick leave pay earned by an individual" (referred to collectively as "Wages") within 180 days prior to June 30, 2022 (the date FGMC filed for chapter 11 bankruptcy protection). However, if expenses or Wages were incurred or earned: (1) before January 1, 2022 (the first day of the 180 day period before June 30, 2022); or (2) within the 180 day period prior to the bankruptcy filing but exceed any balance remaining under the Priority Cap, such claims are not entitled to priority treatment and you should file a Proof of Claim form with the Bankruptcy Court. Submission of a Proof of Claim form does not necessarily mean that you will receive a distribution on your claim. Proof of Claim forms are available online at <http://www.kccllc.net/FGMC>.

Note that payment for expense reimbursement requests submitted to FGMC may take up to several weeks to be issued. We regret any inconvenience caused by the delay. If you file a Proof of Claim with the Bankruptcy Court because you are owed amounts that do not fall within the Priority Cap, FGMC is not permitted to pay you until authorized by the Bankruptcy Court or as otherwise permitted through FGMC's bankruptcy proceeding.

If you have any questions, please contact APinquiries@fgmc.com.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to which they are addressed. If you have received this email in error, please note that any use, copying or distribution of this e-mail, in whole or in part, is strictly prohibited. Please notify the sender by return e-mail of the error and delete this e-mail from your system. Finally, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage caused by any virus transmitted by this email.



Employee Business Expense Reimbursement Policy updated 2020.pdf
619K

Jeff Rollins <rollinsinc7@gmail.com>
To: Human Resources <hrbp@fgmc.com>

Mon, Jul 18, 2022 at 11:05 AM

Can you please tell me where I mail the claim for unpaid commissions?

Please advise,

Jeff

Jeff Rollins

PH: 828-781-1503

[Quoted text hidden]

Human Resources <hrbp@fgmc.com>
To: Jeff Rollins <rollinsinc7@gmail.com>, Human Resources <hrbp@fgmc.com>

Tue, Jul 19, 2022 at 10:27 AM

Hello Jeff,

Please mail your completed claims form to:

Location to File **Proof(s) of Claim**

First Guaranty Mortgage Claims Processing Center
c/o KCC
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245
T: (888) 647 1742

Thank you,

COLLEEN KELLEHER

Onboarding Manager



O 469.592.8164 | Ext 8164

E colleen.kelleher@fgmc.com

5800 Tennyson Parkway, Suite 450

Plano, TX 75024

www.fgmc.com



First Guaranty Mortgage Corporation dba goodmortgage.com | Company NMLS ID 2917 | Equal Housing Opportunity Lender

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From: Jeff Rollins <rollinsinc7@gmail.com>
Sent: Monday, July 18, 2022 11:06 AM
To: Human Resources <hrrbp@fgmc.com>
Subject: Re: Important Message for Former Employees of FGMC

[EXTERNAL] This email originated outside of FGMC. Do not click any links or open attachments unless you recognize the sender.

[Quoted text hidden]

Jeff Rollins <rollinsinc7@gmail.com>
To: Jeff Rollins <jeff.rollins@preferredrate.com>

Tue, Jul 19, 2022 at 2:04 PM

Jeff Rollins

PH: 828-781-1503

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